



December 4, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: *Ex Parte* Communication: WC Docket Nos. 10-90, 14-58, 07-135, and CC
Docket 01-92**

Dear Ms. Dortch:

On November 30, 2018, Genny Morelli and the undersigned of ITTA met with Travis Litman of the Office of Commissioner Rosenworcel regarding the draft Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration in the above-referenced proceedings.¹

During the meeting, we expressed support for the draft's provisions related to increased funding for A-CAM carriers and attendant commitments to buildout at additional locations at speeds of 25/3 Mbps; ensuring sufficient and predictable support for legacy rate-of-return carriers; a new model offer for legacy carriers; and separate budgets for the model-based and legacy programs. We also recommended a modest clarification to the draft to state expressly that existing A-CAM "glide path" carriers will be offered a revised offer of support with increased deployment obligations.

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/

Michael J. Jacobs
Vice President, Regulatory Affairs

cc: Travis Litman

¹ *Connect America Fund et al.*, Report and Order, Further Notice of Proposed Rulemaking, and Order on Reconsideration, FCC-CIRC1812-02 (Public Draft Nov. 21, 2018).